# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

BRIDGET NAMONDO MBOME,

Plaintiff,

v.

HENRY NJIE, EMILIA NJIE, and MARY MBELLA,

CIVIL ACTION NO. 4:18-cv-00597-P

Defendants.

### JOINT STIPULATION OF DISMISSAL

Plaintiff Bridget Mbome and Defendants Henry Njie, Emilia Njie, and Mary Mbella (collectively, "the Parties") hereby file this Joint Stipulation of Dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

- 1. On July 20, 2018, Plaintiff filed her Complaint alleging causes of action against Defendants for trafficking (Counts 1-5 and Count 7), violation of the Fair Labor Standards Act (Count 6), fraud (Count 8), theft of services (Count 9), breach of implied contract (Count 10), and quantum meruit (Count 11). ECF No. 1.
- 2. On March 2, 2020, the Parties attended a JAMS mediation session in Dallas, Texas. At the conclusion of the session, the Parties reached agreement in principle on settlement of their dispute.
- 3. Pursuant to the Parties' settlement, the Parties have agreed to dismissal of all claims in this action. This dismissal is with prejudice for all claims except for Plaintiff's Fair Labor Standards Act claim (Count 6), which is dismissed without prejudice.
  - 4. Each Party shall bear his or her own costs, expenses, and attorneys' fees.

Dated: March 17, 2020

## Respectfully submitted,

By:/s/ Matthew V. Lloyd

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Attorneys for Plaintiff Bridget Namondo Mbome

#### **CERTIFICATE OF CONFERENCE**

Pursuant to Northern District of Texas LR 7.1, I hereby certify that I conferred with Defendants Emilia Njie and Mary Mbella and with Counsel for Defendant Henry Njie regarding this Joint Stipulation of Dismissal, and that each is unopposed to the relief sought herein.

/s/ Matthew V. Lloyd

Matthew V. Lloyd

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of March, 2020, I served all Parties of record in accordance with the Federal Rules of Civil Procedure 5(b)(2).

/s/ Matthew V. Lloyd Matthew V. Lloyd

#### **AGREED:**

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